

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE:	§	
	§	
HOUSTON SPORTS REGIONAL NETWORK,	§	CASE NO. 13-35998
L.P.	§	
	§	
DEBTOR	§	CHAPTER 11

**LIMITED OBJECTION TO DEBTOR'S DISCLOSURE STATEMENT**

[This Pleading Relates to Dkt. Nos. 472 and 499]

McLane Champions, LLC and R. Drayton McLane, Jr. (collectively, "McLane Parties"), creditors and parties in interest of Debtor Houston Sports Regional Network, L.P., file this Limited Objection to the Debtor's Disclosure Statement, and in support, respectfully state as follows:

1. The Disclosure Statement as filed by the Debtor on August 6, 2014 contains significant disclosure issues and lacks the "adequate information" required by Bankruptcy Code Section 1125 and Bankruptcy Rules 2002 and 3017.

2. Section 1125(a)(1) of the Bankruptcy Code defines "adequate information" as "information of a kind, and in sufficient detail, as far as is reasonably practicable...that would enable...a hypothetical investor of the relevant class to make an informed judgment about the plan." 11 U.S.C. § 1125(a)(1).

3. The Disclosure Statement filed by the Debtor does not contain "adequate information, as it is inadequate, inaccurate, and/or misleading.

4. Specifically, the Disclosure Statement is inadequate in that it fails to disclose the legal basis for the proposed subordination of the claims of the McLane Parties.

5. The Disclosure Statement as filed also fails to disclose how much the McLane Parties will receive under the proposed chapter 11 plan.

6. As the Disclosure Statement currently reads, it is not possible for the McLane Parties to make a fully informed decision on whether it should vote to accept the proposed chapter 11 plan.

7. For the reasons stated above, (i) the Disclosure Statement fails to contain adequate information as required by 11 U.S.C. § 1125. The McLane Parties pray that their limited objection be sustained, that approval of the Debtor's Disclosure be denied, that the Motion for Approval of the Disclosure Statement be denied, and for such other and further relief as they may be justly entitled.

DATED: August 28, 2014.

Respectfully submitted,

**FISHER, BOYD, JOHNSON, &  
HUGUENARD, L.L.P.**

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**MCLANE**

**Certificate of Service**

I hereby certify and verify that on July 8, 2014 the forgoing instrument was served via CM/ECF to all parties registered to receive electronic notice and via first class mail to the following:

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